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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

WYATT ALLRED,

Defendant.

2:16-CR-00276-APG-GWF

STIPULATION FOR
PROTECTIVE ORDER

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States, and Monique N. Kirtley, Assistant Federal Public Defender, counsel for defendant WYATT ALLRED, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying

1 information such as social security numbers, drivers' license numbers, dates of birth, financial
2 account numbers or addresses, of participants, witnesses and victims in this case. Such
3 documents shall be referred to hereinafter as "Protected Documents." The parties state as
4 follows:

5
6 1. Protected Documents which will be used by the government in its case in chief
7 include personal identifiers, including social security numbers, drivers' license numbers, dates of
8 birth, financial account numbers and addresses, of participants, witnesses, and victims in this case.

9 2. Discovery in this case is not unusually voluminous, however, given the nature of
10 the allegations, and the facts and circumstances surrounding the crimes with which the defendants
11 are charged, that is, that the defendants manufactured and used counterfeit mail keys to steal mail
12 from repository boxes and then to assumed a the identity of persons other than themselves to obtain
13 money, many of the documents in the discovery, including hundreds of pieces of recovered stolen
14 mail, necessarily include personal identifiers. Redaction of the personal identifiers prior to
15 discovery production will be unnecessarily burdensome on the government's resources and will
16 necessitate a brief delay in the timeliness of discovery disclosure.

17 3. Instead, the United States agrees to provide Protected Documents without redacting
18 the personal identifiers of participants, witnesses, and victims, so long as the Defendants agrees to
19 this Protective Order in an effort to reduce the risk of re-victimization.

20 4. Access to Protected Documents will be restricted to persons authorized by the
21 Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,
22 secretaries and other persons employed by the attorneys of record and performing on behalf of
23 defendants.

1 5. The following restrictions will be placed on defendants, defendants' attorneys and
2 the above-designated individuals unless and until further ordered by the Court. Defendants,
3 defendants' attorneys and the above-designated individuals shall not:

4 a. make copies for, or allow copies of any kind to be made by any other person of
5 Protected Documents;

6 b. allow any other person to read Protected Documents; and

7 c. use Protected Documents for any other purpose other than preparing to defend
8 against the charges in the Indictment or any further superseding indictment arising out of this case.

9 6. Defendants' attorneys shall inform any person to whom disclosure may be made
10 pursuant to this order of the existence and terms of this Court's order.

11 7. The requested restrictions shall not restrict the use or introduction as evidence of
12 discovery documents containing personal identifying information such as social security numbers,
13 drivers' license numbers, dates of birth, financial account numbers and addresses during the trial
14 of this matter.

15 8. Upon conclusion of this action, defendants' attorneys shall return to government
16 counsel or destroy and certify to government counsel the destruction of all discovery documents

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1 containing personal identifying information such as social security numbers, drivers' license
2 numbers, dates of birth, financial account numbers and addresses within a reasonable time, not to
3 exceed thirty days after the last appeal is final.

4 DANIEL G. BOGDEN
United States Attorney

6 /s/Kimberly M. Frayn
KIMBERLY M. FRAYN
7 Assistant United States Attorney

October 4, 2016
DATE

8
9 /s/Monique N. Kirtley
MONIQUE N. KIRTLEY
10 Assistant Federal Public Defender
Counsel for defendant ALLRED

October 4, 2016
DATE

11
12
13 **ORDER**

14 IT IS SO ORDERED this 12th day of October 2016.

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16 _____
UNITED STATES MAGISTRATE JUDGE